

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**JTS CAPITAL 4 LLC,
Plaintiff,**

No. 1:25-cv-00132-CB

v.

**NORTHWEST BANK f/k/a NORTHWEST
SAVINGS BANK,
Defendant.**

MOTION TO DISMISS

Defendant Northwest Bank f/k/a Northwest Savings Bank (“Northwest”) by and through its undersigned counsel, respectfully moves this Court for entry of an order dismissing Plaintiff’s Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state claims against Northwest. The grounds in support of this Motion to Dismiss are set forth in Northwest’s accompanying Memorandum in Support of Motion to Dismiss, which is incorporated by reference herein.

WHEREFORE, for the reasons stated herein, as well as the accompanying Memorandum in Support of Motion to Dismiss, Defendant Northwest Bank f/k/a Northwest Savings Bank respectfully moves this Honorable Court to dismiss Plaintiff’s Complaint and provide such other relief as the Court deems just and proper.

Dated: July 11, 2025

Respectfully submitted,

By: /s/ McArdle Booker

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forthcoming*)

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*Counsel for Northwest Bank f/k/a Northwest
Savings Bank*

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of July, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which I will then send a notification of such filing to all counsel of record.

Dated: July 11, 2025, 2025

Respectfully submitted,

By: /s/ McArdle Booker
D. McArdle Booker, Esq.

*Counsel for Northwest Bank f/k/a Northwest
Savings Bank*